

**UNITED STATES BANKRUPTCY COURT FOR THE  
DISTRICT OF MARYLAND  
Baltimore Division**

<i>In re:</i>	*	Case No. 25-184-ELG
<i>Swain Landing LaPlata JC, LLC</i>	*	U.S. Bankruptcy Court for the District of Columbia
	*	
<b>Debtor</b>	*	
*       *       *       *       *	*	
<i>Claudia Engelhorn, et al.</i>	*	Case No.: 25-00159
	*	U.S. Bankruptcy Court for the District of Maryland
<b>Plaintiffs</b>	*	
	*	
v.	*	Case No.: C-24-CV-002631
	*	Circuit Court for Baltimore City,
<i>Erik D. Bolog, et al.</i>	*	Maryland
	*	
	*	
<b>Defendants</b>	*	

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### **JOINT STIPULATION REGARDING EXTENSION OF RESPONSE DEADLINE**

Plaintiffs and Counter-Defendants, Claudia Engelhorn (“Ms. Engelhorn”), individually and as Trustee of the Whitewater Revocable Trust dated September 30, 2021, as amended, (“Whitewater Trust”) and White Pearl, LLC (“White Pearl”) and, collectively, “Plaintiffs”), Defendants and Counter-Plaintiffs Erik D. Bolog (“Mr. Bolog”), Erik D. Bolog as Trustee of the JAREB Irrevocable Trust, dated October 11, 2021 (“Mr. Bolog as Trustee”), Science Park Associates, LLC (“Science Park”), and Darnestown Road, Inc. (“Darnestown Road,” and collectively with Mr. Bolog, Mr. Bolog as Trustee, and Science Park, the “Bolog Parties”), and above-captioned debtor Swain Landing LaPlata JC, LLC (the “Debtor” and, together with the Plaintiffs, and Bolog Parties, the “Parties”), submit this joint stipulation extending Debtor’s and Bolog Parties’ time to file a response to the *Motion for Remand and Abstention to the State Court* [Adv. Pro. Dkt. No. 43] (the “Motion for Remand”).

Plaintiffs, Bolog Parties, and Debtor previously agreed to extend the Bolog Parties' and Debtor's deadline to respond to the Motion to Remand to July 31, 2025. Plaintiffs, Bolog Parties, and Debtor now each agree to further extend the Debtor's and the Bolog Parties' deadline to respond to the Motion for Remand to August 7, 2025.

Nothing contained herein shall be construed to prohibit the Parties from requesting or agreeing to additional extensions.

Date: July 31, 2025

/s/ Maurice B. VerStanding (with consent)  
Maurice Belmont VerStandig  
**THE VERSTANDIG LAW FIRM, LLC**  
9812 Falls Road #114-160  
Potomac, MD 20854  
301-444-4600  
[mac@mbvesq.com](mailto:mac@mbvesq.com)

*Attorney for Debtor*

/s/ Matthew M. Karlan (with consent)  
Douglas F. Gansler  
**CADWALADER, WICKERSHAM & TAFT LLP**  
1919 Pennsylvania Ave N.W.  
Washington D.C. 20006  
202-862-2300  
[douglas.gansler@cwt.com](mailto:douglas.gansler@cwt.com)

-and-

Matthew M. Karlan  
**CADWALADER, WICKERSHAM & TAFT LLP**  
200 Liberty Street  
New York, NY 10281  
212-504-6000  
[Matthew.Karlan@cwt.com](mailto:Matthew.Karlan@cwt.com)

*Counsel for Defendants Erik D. Bolog, Individually  
and as Trustee of the JAREB Irrevocable Trust  
Agreement dated October 11, 2021; Darnestown  
Road, Inc.; and Science Park Associates, LLC*

/s/ Sam J. Alberts  
Sam J. Alberts  
**DENTONS US LLP**  
1900 K St. NW  
Washington, DC 20006  
202-496-7500  
[sam.alberts@dentons.com](mailto:sam.alberts@dentons.com)

-and-

Wes P. Henderson  
Patrick D. Gardiner  
**HENDERSON LAW, LLC**  
2127 Espey Court, Suite 204  
Crofton, Maryland 21114  
410-721-2258  
[wph@hendersonlawllc.com](mailto:wph@hendersonlawllc.com)  
[patrick@hendersonlawllc.com](mailto:patrick@hendersonlawllc.com)

*Attorneys for the Plaintiffs*

**CERTIFICATE OF SERVICE**

I certify that on this 31st day of July, 2025, a copy of the foregoing was served electronically upon filing via the ECF system, with copies being sent to all parties receiving electronic notice herein.

/s/ Sam J. Alberts

Sam J. Alberts